

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Claude M. Stern (Bar No. 96737)  
3 claudestern@quinnemanuel.com  
4 Cole Malmberg (Bar No. 305250)  
5 colealmberg@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, California 94065  
Telephone: (650) 801-5002  
Facsimile: (650) 801-5100

6 Tigran Guledjian (Bar No. 207613)  
7 tigranguledjian@quinnemanuel.com  
8 Valerie Roddy (Bar No. 235163)  
9 valerieroddy@quinnemanuel.com  
10 Scott A. Florance (Bar No. 227512)  
11 scottflorance@quinnemanuel.com  
12 Jordan B. Kaericher (Bar No. 265953)  
13 jordankaericher@quinnemanuel.com  
14 865 S Figueroa Street, 10th Floor  
15 Los Angeles, California 90017  
16 Telephone: (213) 443-3000  
17 Facsimile: (213) 443-3100

18 *Attorneys for Defendants Alphonso Inc., Ashish  
19 Chordia, Lampros Kalampoukas, and Raghu  
20 Kodige*

21 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

22 FREE STREAM MEDIA CORP. d/b/a  
23 SAMBA TV,

Case No. 3:17-cv-02107-RS

24 Plaintiff,

**STIPULATION AND [PROPOSED]  
25 ORDER CONTINUING EXPERT  
DISCLOSURE AND DISCOVERY  
26 DEADLINES BY ONE WEEK**

27 v.  
28 ALPHONSO INC., et al.

Defendants.

**STIPULATION**

29 WHEREAS, Plaintiff Free Stream Media Corp. d/b/a Samba TV (“Samba”) has sued  
30 defendants Alphonso Inc., Ashish Chordia, Lampros Kalampoukas, and Raghu Kodige  
31 (collectively, “Alphonso”) for patent infringement in the above-captioned action;

1        WHEREAS, Alphonso intends to file a motion for broader relief from the Court's  
2 scheduling order as a result of Samba's September 15, 2017 motion for leave to amend its  
3 infringement contentions and other case developments, which Samba anticipates it will oppose;

4        WHEREAS, pursuant to the Court's June 6, 2017 Case Management Order (ECF No. 148),  
5 the deadline for serving opening expert reports is September 22, 2017;

6        WHEREAS, the parties agree that all parties would benefit from an additional week to  
7 complete opening expert reports, while the parties prepare and oppose the above-mentioned  
8 motions, and address discovery recently provided in the case, although by filing this stipulation  
9 neither party is waiving any rights to oppose any action taken by the other party, nor by filing or  
10 agreeing to this stipulation is any party agreeing or conceding that one week is sufficient time to  
11 review and process this discovery;

12        WHEREAS, extending all expert disclosure and discovery deadlines by one additional  
13 week will not require any other dates in the Case Management Order to move;

14        WHEREAS, the parties agree that (1) this one-week extension is being requested without  
15 prejudice to any further relief any party may seek or any argument any party might make; and  
16 (2) they will not cite the fact of this one-week extension as evidence that any party has or has not  
17 been prejudiced, as an admission by any party, or that any party has acquiesced in any action by  
18 any other party; and

19        WHEREAS, the parties agree that the existence of this stipulation and order will be cited  
20 only for the fact of the revised disclosure and discovery deadlines;

21        The parties hereby agree and move the Court as follows:

22        1.        On or before September 29, 2017, the parties will designate experts in accordance  
23 with Federal Rule of Civil Procedure 26(a)(2).

24        2.        On or before October 27, 2017, the parties will designate their supplemental and  
25 rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).

26        3.        On or before November 10, 2017, all discovery of expert witnesses pursuant to  
27 Federal Rule of Civil Procedure 26(b)(4) shall be completed.

1           4. No other dates in the June 6, 2017 Case Management Order (ECF No. 148) are  
2 changed as a result of this stipulation and order.

3           5. The extension of these dates is made without prejudice to any other motion or  
4 argument the parties may advance and the existence of this stipulation and order will be cited only  
5 for the fact of the revised disclosure and discovery deadlines.

6           Respectfully submitted,

7           DATED: September 20, 2017

TENSEGRITY LAW GROUP, LLP

8           By /s/ William P. Nelson

9           Matthew D. Powers (Bar No. 104795)  
10           William P. Nelson (Bar No. 196091)  
11           Jennifer K. Robinson (Bar No. 270954)  
12           Samantha A. Jameson (Bar. No. 296411)  
13           Natasha M. Saputo (Bar No. 291151)  
14           TENSEGRITY LAW GROUP, LLP  
15           555 Twin Dolphin Drive, Suite 650  
16           Redwood Shores, CA 94065  
17           Telephone: (650) 802-6000  
18           Facsimile: (650) 802-6001  
19           Email:  
20           matthew.powers@tensegritylawgroup.com  
21           william.nelson@tensegritylawgroup.com  
22           jen.robinson@tensegritylawgroup.com  
23           samantha.jameson@tensegritylawgroup.com  
24           natasha.saputo@tensegritylawgroup.com  
25           samba\_service@tensegritylawgroup.com

26           *Attorneys for Plaintiff,  
27           Free Stream Media Corp. d/b/a Samba TV*

28           DATED: September 20, 2017

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

29           By /s/ Claude M. Stern

30           Claude M. Stern  
31           *Attorneys for Defendants Alphonso Inc., Ashish  
32           Chordia, Lampros Kalampoukas, and Raghu  
33           Kodige*

## **[PROPOSED] ORDER**

It is so ordered.

1. On or before September 29, 2017, the parties will designate experts in accordance with Federal Rule of Civil Procedure 26(a)(2).

2. On or before October 27, 2017, the parties will designate their supplemental and rebuttal experts in accordance with Federal Rule of Civil Procedure 26(a)(2).

3. On or before November 10, 2017, all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

4. No other dates in the June 6, 2017 Case Management Order (ECF No. 148) are changed as a result of this stipulation and order.

5. The extension of these dates is made without prejudice to any other motion or argument the parties may advance and the existence of this stipulation and order will be cited only for the fact of the revised disclosure and discovery deadlines.

DATED: September 28, 2017

  
The Honorable Richard L. Schaefer

The Honorable Richard Seesorg  
UNITED STATES DISTRICT COURT JUDGE